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Dr. Dave Campagna
Agency for Toxic Substances and Disease Registry
Executive Park, Building 4
1600 Clifton Road, NE, E-31
Atlanta, Georgia 30333

Dear Dr. Campagna:

Thank you for the opportunity to comment on ATSDR's Soil-Pica, Soil-Ingestion and Health Outcome Investigation that currently is being planned for the VB/I70 site in Denver. The Denver Department of Environmental Health (DEH) appreciates ATSDR performing the study, and helping us better understand potential exposures and associated health effects that may be present in those communities.

Our comments are general in nature, and mainly focused on the objectives of the study. We believe the study design should incorporate the following concerns.

DEH strongly supports the portion of the study focused on health outcomes. We have repeatedly heard from community members that they are most interested in health issues, and wish to understand if site-related health effects are occurring in their communities. ATSDR must provide an opportunity for participation in the health study to all individuals in the VB/I70 site. This should include an invitation to participate in the examination by a public health nurse, as well as the health questionnaire. We believe the health study performs a valuable service in determining if site-related health effects are present in the community. ATSDR has raised significant concerns in the community regarding the potential for site-related health effects. If a significant health effect is present in the community, it is important that your study is able to measure its occurrence and severity.

Participation in the study, particularly the examination by a public health nurse, should be extended to adults, as well as children. This would address a concern, expressed by community members, that longer-term exposures may have resulted in adverse health effects for longtime residents.

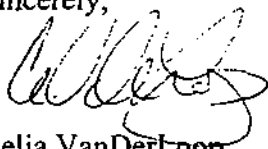
Lead exposure is a significant health concern in the study area. We strongly encourage ATSDR to provide blood lead testing for all young children within the study area. Existing evidence shows that children within the VB/I70 area have high rates of elevated blood lead levels. Investigating the extent of this significant health concern should be a priority for public health agencies, such as ATSDR. We recognize that ATSDR has committed to blood lead testing for

some children. However, much of the time, ATSDR's emphasis appears to be on exposures to arsenic, while exposures to lead appear to be overlooked. If pica behavior is a concern for exposure to arsenic, it should also cause concern for exposure to lead. If pica children ingest soil at the levels suggested by ATSDR, they have a potential for elevated blood lead levels, even if lead is present in soil at urban background concentrations.

We believe the pica study must be quantitative as well as qualitative. While it is interesting and desirable to learn if soil pica occurs in the population, we believe it is equally important to evaluate if such behavior is likely to result in acute health effects from exposure to arsenic. For site purposes, it does little good to identify a child(ren) as pica, without addressing the quantity of soil ingested. Quantitative information is needed to support risk assessment and risk management decisions, for the study to be beneficial at this site. The risk assessment process is instrumental in determining soil cleanup levels, and ATSDR has raised numerous questions regarding the protectiveness of EPA's soil ingestion assumptions. Therefore, the pica study must provide reliable soil ingestion rates in order to resolve these concerns.

Thank you for your consideration in these matters. If you have questions, please contact Gene Hook at 303-285-4068 or me at 303-285-4065.

Sincerely,



Celia VanDerLoop
Environmental Protection Division

cc: VB/170 Working Group
Dr. Jim Rutenber - UCHSC